

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

LeClairRyan PLLC,

Debtor.¹

Case No. 19-34574-KRH

Chapter 7

**NOTICE OF RESOLUTION BETWEEN QUINN EMANUEL URQUHART &
SULLIVAN, LLP AND FOLEY & LARDNER LLP WITH RESPECT TO FOLEY'S
FINAL FEE APPLICATION**

Please be advised that Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn”) and Foley & Lardner LLP (“Foley”) have reached a resolution of their disputes with respect to the *Final Application for Compensation of Fees and Expense of Foley & Lardner LLP, as Special Counsel to the Trustee, for Approval and Allowance of Compensation and Reimbursement of Expenses Incurred for the Period from January 30, 2020 through July 31, 2023* [Dkt. No. 1960] (the “Foley Final Fee Application”).

As part of such resolution, Foley and Quinn, with the support of Ms. Tavenner, the Chapter 7 Trustee in this case, have agreed to the following:

1. Foley shall file an Amended Final Fee Application (the “Amended Application”). The Foley Final Fee Application seeking *quantum meruit* compensation will therefore be considered withdrawn and the Amended Application will replace in its entirety the Foley Final Fee Application and will not seek any *quantum meruit* compensation.

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

2. Foley shall formally withdraw the following declarations previously submitted to this Court by Mr. Geoffrey Goodman: (a) the *Declaration of Geoffrey S. Goodman* [Exhibit A to Dkt. No. 1365], filed on June 1, 2022; (b) the *Supplemental Declaration of Geoffrey S. Goodman* [Dkt No. 1397], filed on June 8, 2022; and (c) the *Declaration of Geoffrey S. Goodman* [Exhibit A to Dkt No. 1960], filed on August 7, 2023.

3. The Amended Application shall only seek final compensation from the Estate for the total amount of fees and costs already approved by the Court on an interim basis pursuant to Dkt. Nos. 587, 657, 779 and 931, **and** already previously paid to Foley by the Estate.²

4. To the extent the Court approves the Amended Application, the Estate will not be required to pay Foley any additional amounts for either fees or expenses.

5. Foley alone shall pay all fees and costs of the Chapter 7 Trustee associated with the Final Fee Application and the Amended Application, in the amount of \$38,000.00.

6. Quinn and Foley both agree that any fees and costs incurred by Quinn and Foley in connection with the Final Fee Application and the Amended Application will not be charged to the Estate. Other than a set amount already agreed by Foley to be paid directly to Quinn for certain fees and expenses, Quinn and Foley will be responsible for their own individual fees and costs incurred in connection with this matter.

7. Unless the Court instructs otherwise, the Amended Application will be set for hearing by Foley at the regular scheduled Omnibus Hearing for this case on November 28, 2023, replacing the currently scheduled evidentiary hearing for the Foley Final Fee Application that is

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in Quinn Emanuel, Urquhart, & Sullivan, LLP's Objection to the Final Application for Compensation of Fees and Expenses of Foley & Lardner, LLP [Dkt. No. 1983] (the "Quinn Objection").

no longer necessary due to the resolution of this matter between Quinn and Foley, with the above referenced terms supported by the Chapter 7 Trustee.

Dated: October 25, 2023

Respectfully submitted,

/s/ Erika L. Morabito

Erika L. Morabito (VSB No. 44369)

Brittany J. Nelson (VSB No. 81734)

QUINN EMANUEL URQUHART & SULLIVAN, LLP

1300 I Street, NW, Suite 900

Washington, DC 20005

(202) 538-8000 (telephone)

(202) 538-8100 (facsimile)

erikamorabito@quinnemanuel.com

-and-

David Grable (Admitted *Pro Hac Vice*)

QUINN EMANUEL URQUHART & SULLIVAN, LLP

865 S. Figueroa Street, 10th Floor

Los Angeles, CA 90017

(213) 443-3669 (telephone)

(213) 443-3100 (facsimile)

davegrable@quinnemanuel.com

Attorneys for Quinn Emanuel Urquhart & Sullivan, LLP

SEEN AND AGREED:

/s/ Jonathan L. Hauser

Jonathan L. Hauser (VSB No. 18688)
JONATHAN L. HAUSER, ESQ.
929 Bobolink Drive
Virginia Beach, VA 23451
(757) 639-7768 (telephone)
jhauser929@gmail.com

- and -

Susan Poll Klaessy (VSB No. 87021)
Geoffrey S. Goodman (Admitted *Pro Hac Vice*)
FOLEY & LARDNER LLP
321 North Clark Street, Suite 3000
Chicago, IL 60654-4762
(312) 832-4500 (telephone)
(312) 832-4700 (facsimile)
spollklaessy@foley.com
ggoodman@foley.com

- and -

Holland N. O'Neill (Admitted *Pro Hac Vice*)
Steven C. Lockhart (Admitted *Pro Hac Vice*)
Robert T. Slovak (Admitted *Pro Hac Vice*)
Mark C. Moore (Admitted *Pro Hac Vice*)
Andrew A. Howell (Admitted *Pro Hac Vice*)
Stephanie L. McPhail (Admitted *Pro Hac Vice*)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201
(214) 999-3000 (telephone)
honeil@foley.com
slockhart@foley.com
rslovak@foley.com
mmore@foley.com
ahowell@foley.com
amcphail@foley.com

Attorneys for Foley & Lardner LLP

SEEN AND NO OBJECTION:

/s/ Paul S. Beran

Paula S. Beran (VSB No. 34679)
Tavener & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, VA 23219
(804) 783-8300 (telephone)
pberan@tb-lawfirm.com

*Attorney for Lynn Tavenner, Chapter 7
Trustee*

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of October, 2023 a true copy of the foregoing was served on all registered parties via CM/ECF. In addition, a courtesy electronic copy was served on the Office of the United States Trustee.

/s/ Erika L. Morabito
Attorney for Quinn Emanuel Urquhart & Sullivan, LLP